

Message

From: Alexander, Shanna [Alexander.Shanna@epa.gov]
Sent: 5/19/2021 6:19:03 AM
To: Amoroso, Cathy [Amoroso.Cathy@epa.gov]; Froede, Carl [Froede.Carl@epa.gov]; Richards, Jon M. [Richards.Jon@epa.gov]; Frederick, Tim [Frederick.Tim@epa.gov]
Subject: RE: Can we proceed to SAP approval and "park" the DQOs to a future approval?
Attachments: 2021-5-19_EPA SAP DQOs Cmmts CA_SA.docx

Attached are my comments combined with Cathy's on Section 4 DQOs. I agree with Cathy in that the DQOs are mostly acceptable for the fish sampling activities, but not the development of health-based effluent limits. I think the mixing zone/dilution factor and the role it plays in the calculation of the effluent limits and the fish ingestion rate can both be addressed in the form of a Technical Memorandum. Typically, calculations such as these are presented in a Tech Memo with attachments containing tables of the results and any supporting figures.

Shanna

From: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Sent: Saturday, May 15, 2021 12:09 PM
To: Froede, Carl <Froede.Carl@epa.gov>; Richards, Jon M. <Richards.Jon@epa.gov>; Alexander, Shanna <Alexander.Shanna@epa.gov>; Frederick, Tim <Frederick.Tim@epa.gov>
Subject: RE: Can we proceed to SAP approval and "park" the DQOs to a future approval?

DQOs are listed in section 4 of the SAP erratum. With some minor edits, I think the DQOs in the SAP area acceptable. Aside from the fish sampling event, there is a need to develop DQOs and procedures for addressing several important issues, as discussed during the DRAT call, such as: a) how to develop consumption rates, b) how to develop effluent limits from instream water quality numbers ("dilution" issue), and c) how to adjust the ultimate effluent limits to account for existing risk (if any).

The SAP erratum doesn't address these matters, and I don't think it has to since the purpose of the SAP erratum is to guide the fish collection work.

The DQOs in the SAP are fine for the fish event (with some edits), but we will need something else (another SAP erratum or work plan or some kind of outline??) that addresses how these other items will be developed.

Just my opinion – certainly will defer to you all if there is another approach.

Attached are my comments on the SAP erratum (5-7-21), Section 4 DQOs.

From: Froede, Carl <Froede.Carl@epa.gov>
Sent: Thursday, May 13, 2021 1:58 PM
To: Amoroso, Cathy <Amoroso.Cathy@epa.gov>; Richards, Jon M. <Richards.Jon@epa.gov>; Alexander, Shanna <Alexander.Shanna@epa.gov>; Frederick, Tim <Frederick.Tim@epa.gov>
Subject: Can we proceed to SAP approval and "park" the DQOs to a future approval?
Importance: High

Folks:

I return to the office on Monday.

Lynn Sims mentioned that we approve the SAP "Erratum" and address the DQOs separately approving them later – possibly once we have the Fall sampling results.

Please give me your thoughts as to how we move forward with SAP approval and address the remaining DQO issues.

Thanks very much,
Carl